

FILED

TENENBAUM & SASS, P.C.

**BRADSHAW ROST, vsb #27134**  
**4504 WALSH STREET, SUITE 200**  
**CHEVY CHASE, MD 20015**  
**(301) 961-5300**

2010 JUL 12 P 3:06  
CLERK US DISTRICT COURT  
ALEXANDRIA, VIRGINIA

ATTORNEYS FOR DEFENDANT DISH NETWORK L.L.C.

MANTIAN ZHU

Plaintiff

**vs.**

DISH NETWORK L.L.C.

**Defendant.**

UNITED STATES DISTRICT COURT FOR  
THE EASTERN DISTRICT OF VIRGINIA

Civil Action 1:10cv777  
LOG/TCB

## NOTICE OF REMOVAL

Defendant DISH Network L.L.C., by and through its counsel, and pursuant to 28 U.S.C. §1446(b), hereby files its Notice of Removal of the pending state court action in the Circuit Court for Fairfax County, Virginia, in the matter styled as *Mantian Zhu vs. DISH Network L.L.C.*, Case CL 2009-16778 (the “State Court Action”). In support thereof, the following is stated:

1. Defendant DISH Network L.L.C. (“Defendant”) is a limited liability company organized under the laws of Colorado with its principal place of business located in the State of Colorado.
2. Plaintiff Mantian Zhu (“Plaintiff”) is an individual and citizen of the Commonwealth of Virginia.
3. On July 9, 2010, Plaintiff filed an Amended Complaint in the State Court Action increasing its damage claim from \$66,000.00 to \$135,500.00, and therefore the amount in controversy exceeds \$75,000.00.

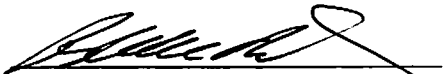
4. There is complete diversity of citizenship between Plaintiff and Defendant and this Court now has diversity jurisdiction under Title 28 U.S.C. §1332(a). The State Court Action was commenced within a year of the filing of this Notice of Removal.

5. Attached hereto is copy of all process, pleadings, and orders served upon the Defendant in the State Court Action.

**DISH NETWORK L.L.C.**

**BY COUNSEL**

**RESPECTFULLY SUBMITTED**



Bradshaw Rost, Esq. Bar # 27134

***Tenenbaum & Saas, PC***

4504 Walsh Street, Suite 200

Chevy Chase, MD 20815

Tel (301)961-5300

Counsel for Defendant DISH Network L.L.C.

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a copy of the Defendant's Notice of Removal was sent via U.S. Mail, First Class, Postage Prepaid on July 12, 2010 to:

A. Charles Dean

Gross & Romanick, P.C.

3975 University Drive

Suite 410

Fairfax, Virginia 22030

  
Bradshaw Rost